



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LZ  
F. #2021R00608

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 4, 2024

By ECF

James Darrow, Esq.  
Federal Defenders of New York  
1 Pierrepont Plaza, 16th Floor  
Brooklyn, New York 11201

Re: United States v. Domagoj Patkovic  
Criminal Docket No. 24-CR-317 (RER)

Dear Counsel:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's initial production, which was disclosed on October 16, 2024. The government also requests reciprocal discovery from the defendant. These materials are produced under the terms of the Stipulation and Protective Order signed by counsel and entered by the Court. The "Sensitive Discovery Materials" are identified by the prefix "SDM." The production consists of the following:

- Search Warrants and related materials are enclosed herein and Bates-stamped SDM000001 - SDM000367.
- Audio recordings of threat and 911 calls are enclosed and Bates-stamped SDM000368 - SDM000375.
- Documents and records detailing NYPD 911 calls are enclosed and Bates-stamped SDM000376 - SDM000384.
- Video recordings of body worn camera footage of arrest are enclosed and Bates-stamped DP000040 - DP000056.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Laura Zuckerwise  
Alexander Solomon  
Laura Zuckerwise  
Andrew Reich  
Assistant U.S. Attorney  
(718) 254-6204

Enclosures

cc: Clerk of the Court (RER) (by ECF) (without enclosures)